

COVINGTON

BEIJING BRUSSELS LONDON LOS ANGELES
NEW YORK SAN FRANCISCO SEOUL
SHANGHAI SILICON VALLEY WASHINGTON

Anthony Herman

Covington & Burling LLP
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
T +1 202 662 5280
aherman@cov.com

By Electronic Filing

July 3, 2017

Hon. Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: Abu Nahl v. Abou Jaoude
No. 15 Civ. 09755 (LGS) (JCF)
Report on Status of Efforts to Effect Service**

Dear Judge Schofield:

Pursuant to the Court's Order of March 3, 2016, Plaintiffs submit this letter to update the Court regarding their efforts to effect service upon defendants in the above-captioned action. The Court has issued Requests for International Judicial Assistance ("letters rogatory") seeking to serve defendants to this action.

The Court issued a letter rogatory to the Republic of Togo seeking its assistance in serving defendant Oussama Salhab. As of the date of this letter, no certification has been returned affirming that the Togolese authorities have successfully executed the letter rogatory with respect to this defendant.

The Court also issued letters rogatory to the Republic of Lebanon seeking its assistance in serving additional defendants to this action: Georges Zard Abou Jaoude, Ahmad Safa, Mahmoud Hassan Ayash, Hassan Ayash Exchange Company, Ellissa Holding Company, and the Lebanese Canadian Bank. The Lebanese Ministry of Justice has affirmed that judicial warrants for Abou Jaoude, Safa, and Hassan Ayash¹ have been fulfilled. None of these defendants has entered an appearance or answered the

¹ It is unclear whether the Lebanese authorities served the correct Hassan Ayash: The year of birth specified for Hassan Ayash in the return of letters rogatory differs from the year of birth specified in the Treasury Department's designation of Hassan Ayash as a person whose property is blocked pursuant to the Foreign Narcotics Kingpin Designation Act, 76 Fed. Reg. 5858 (Feb. 2, 2011).

COVINGTON

Hon. Lorna G. Schofield
July 3, 2017
Page 2

complaint. As of the date of this letter, no certification has been returned affirming that the Lebanese authorities have successfully executed the letters rogatory with respect to Hassan Ayash Exchange Company, Ellissa Holding Company, or the Lebanese Canadian Bank.

To ensure proper service on those defendants as to whom letters rogatory have not been returned, Plaintiffs have sought the assistance of the Clerk of the Court to serve such defendants by Federal Express. In addition, Plaintiffs have obtained additional addresses for defendant Mohamad Hamdoun and have sought to serve this defendant.

The Clerk of the Court has sent Federal Express packages to Mahmoud Hassan Ayash, Hassan Ayash Exchange Company, the Lebanese Canadian Bank, Oussama Salhab, Ellissa Exchange Company, and Mohamad Hamdoun. Plaintiffs understand that Federal Express has successfully delivered service to defendants Mahmoud Hassan Ayash, Hassan Ayash Exchange Company, and the Lebanese Canadian Bank. Plaintiffs are seeking to obtain signatures evidencing these deliveries and will file them with the Court. The Federal Express deliveries to Oussama Salhab, Ellissa Exchange Company, and Mohamad Hamdoun are in transit, and plaintiffs will continue to monitor the status of these deliveries.

Respectfully submitted,

/s/ Anthony Herman
Anthony Herman
(admitted *pro hac vice*)